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Attorney for Defendant, Parkshore

Development Corporation

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY CAMDEN VICINAGE

PENNSYLVANIA NATIONAL MUTUAL CASUALTY INSURANCE COMPANY,

Plaintiff,

LIAINCLLI

vs.

PARKSHORE DEVELOPMENT CORPORATION,

and

CATALINA COVE CONDOMINIUM ASSOCIATION, INC.,

and

KEEN'S CAULKING AND WATERPROOFING,

and

ABC CORPORATION 1 through ABC : CORPORATION X, fictitious : names, :

Defendants.

Civil Action No.: 07-1331 (RBK-JS)

AFFIDAVIT OF KENNETH R. STEINBERG

STATE OF NEW JERSEY:

SS:

COUNTY OF ATLANTIC :

- I, KENNETH R. STEINBERG, of full age, and being duly sworn according to law, upon his oath deposes and says:
- 1. I am the President of Parkshore Development Corporation (hereinafter "Parkshore") located in Linwood, New Jersey. I have held that position since approximately 1990.
- 2. In that capacity, I am familiar with the construction of the Catalina Cove Condominium units in Linwood, New Jersey including the subcontracts that Parkshore entered into for the site and building construction.
- 3. I have reviewed Parkshore's file concerning the construction of Catalina Cove. The file reflects that the following work was performed by subcontractors:
 - Roofing, which included installation of flashings,
 was performed by three different subcontractors,
 M.T. Construction, Seashore Construction and Eagle
 Construction;
 - b. Framing work, which also included installation of the sheathing, windows, gable vents, wood fascia trims and vinyl siding, was performed by D.W. Hermann;

- c. Andersen windows and doors were supplied and assembled by Mansion Supply and Universal Supply.
- d. Caulking/sealant work as well as the stucco finish was done by Surfaces/Lanzi;
- e. Mechanical vent hoods for dryers and bathrooms

 were installed by the HVAC contractors, J. Wittman

 & Sons and Brittain Electric;
- f. The irrigation system was installed by Paul Chubb Irrigation;
- g. Rough site grading was performed by H. Minuth and final grading was done by Bayview Garden

 Nurseries;
- h. Foundation construction was performed by VolpeMasonry;
- i. Gutters and leaders were installed by Classic Gutters.
- 4. Construction of the first unit at Catalina Cove was completed in 1989 and the Certificate of Occupancy issued on December 14, 1989. Construction of the last unit at Catalina Cove was completed in 1998 and the Certificate of Occupancy issued on August 27, 1998.
- 5. In July 1999 Parkshore was notified by Catalina Cove Condominium Association (hereinafter "the Association") that stucco around some of the windows had not been caulked properly

and they were leaking.

6. Parkshore retained a subcontractor, Keen's Caulking and Waterproofing, to perform the recaulking as requested by the Association.

KENWETH R. STEINBERG

Sworn and subscribed to before me this 27^{+h} day of February 2008.

A Notary Public of the State of New Jersey

THERESA M. GAWLE
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires March 3-2002

Language 8, 2012